

EXHIBIT A

Subject: RE: Stipulation for Extension Request - Yuting Chen v. Ariel Abittan, et al., Case No. 21-cv-09393-NC

Date: Thursday, June 29, 2023 at 2:49:06 PM Eastern Daylight Time

From: Constantine Economides <ceconomides@fnf.law>

To: Craig Hansen <craig@hansenlawfirm.net>, Collin Greene <collin@hansenlawfirm.net>, Brianna Pierce <bpierce@fnf.law>, Phil Yeager <phil@hansenlawfirm.net>, Jingjing Ye <jye@yefirm.com>, 'Brian Barnhorst' <bbarnhorst@sacattorneys.com>, James Giacchetti <jgiacchetti@sacattorneys.com>, Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>, 'James Cai' <jcai@sacattorneys.com>, Woody Wu <wwu@sacattorneys.com>, selenachen1228@gmail.com <selenachen1228@gmail.com>, selenafindora.org <selenafindora.org>

CC: Stephen C. Holmes <steve@hansenlawfirm.net>, Niraj Thakker <nthakker@fnf.law>, Athanasia Karadjas <akaradjas@fnf.law>

Attachments: image001.png, image002.png, image003.jpg

Craig,

Thanks for the response, and we'll state in the extension motion that you oppose. The Court ordered that no reply is permitted without further leave of court, so it's unclear how/why you would incur any additional fees.

Kind regards,

Constantine P. Economides

Partner

Freedman Normand Friedland

LLP

SunTrust International Center

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(@) ceconomides@fnf.law

From: Craig Hansen <craig@hansenlawfirm.net>

Sent: Thursday, June 29, 2023 2:08 PM

To: Constantine Economides <ceconomides@fnf.law>; Collin Greene <collin@hansenlawfirm.net>; Brianna Pierce <bpierce@fnf.law>; Phil Yeager <phil@hansenlawfirm.net>; Jingjing Ye <jye@yefirm.com>; 'Brian Barnhorst' <bbarnhorst@sacattorneys.com>; James Giacchetti <jgiacchetti@sacattorneys.com>; Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>; 'James Cai' <jcai@sacattorneys.com>; Woody Wu <wwu@sacattorneys.com>; selenachen1228@gmail.com; selenafindora.org

Cc: Stephen C. Holmes <steve@hansenlawfirm.net>; Niraj Thakker <nthakker@fnf.law>; Athanasia Karadjas <akaradjas@fnf.law>

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[EXTERNAL SENDER]

Constantine,

We oppose the requested extension. And if we have to spend any more attorney time responding to your retaliatory actions, we will add that to our existing fee request.

Best,

Craig Alan Hansen



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From: Constantine Economides <ceconomides@fnf.law>

Sent: Thursday, June 29, 2023 10:01 AM

To: Collin Greene <collin@hansenlawfirm.net>; Brianna Pierce <bpierce@fnf.law>; Phil Yeager <phil@hansenlawfirm.net>; Jingjing Ye <jye@yefirm.com>; 'Brian Barnhorst' <bbarnhorst@sacattorneys.com>; James Giacchetti <jgiacchetti@sacattorneys.com>; Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>; 'James Cai' <jcai@sacattorneys.com>; Woody Wu <wwu@sacattorneys.com>; selenachen1228@gmail.com; selena@findora.org
Cc: Craig Hansen <craig@hansenlawfirm.net>; Stephen C. Holmes <steve@hansenlawfirm.net>; Niraj Thakker <nthakker@fnf.law>; Athanasia Karadjas <akaradjas@fnf.law>
Subject: RE: Stipulation for Extension Request - Yuting Chen v. Ariel Abittan, et al., Case No. 21-cv-09393-NC

All,

As you have likely seen, we filed our Rule 41 motion for voluntary dismissal without prejudice yesterday (which was the deadline for a joint proposed schedule).

Separately, today, we'll be filing a motion for an additional week (until Friday, July 7) to respond to the Hansen Firm's request for \$5,820. The basis is that I have been in trial every day since Monday (June 26), finishing today, and then I'm flying on a redeye to L.A. for an all-day mediation tomorrow. Ms. Pierce has been on a pre-planned family trip (for an out-of-town competition) since last weekend. And the July 4th holiday is early next week.

Please let us know by 3pm PT if there is any opposition to the requested extension.

Kind regards,

Constantine P. Economides

Partner

Freedman Normand Friedland
LLP

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From: Collin Greene <collin@hansenlawfirm.net>

Sent: Thursday, May 18, 2023 9:07 PM

To: Brianna Pierce <bpierce@fnf.law>; Phil Yeager <phil@hansenlawfirm.net>; Constantine Economides <ceconomides@fnf.law>; Jingjing Ye <jye@yefirm.com>; 'Brian Barnhorst' <bbarnhorst@sacattorneys.com>; James Giacchetti <jgiacchetti@sacattorneys.com>; Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>; 'James Cai' <jcai@sacattorneys.com>; Woody Wu <www@sacattorneys.com>; selenachen1228@gmail.com; selena@findora.org

Cc: Craig Hansen <craig@hansenlawfirm.net>; Stephen C. Holmes <steve@hansenlawfirm.net>

Subject: RE: Stipulation for Extension Request - Yuting Chen v. Ariel Abittan, et al., Case No. 21-cv-09393-NC

[EXTERNAL SENDER]

All,

Please see the attached just submitted for filing.

Regards,

Collin Dane Greene



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San Jose, CA 95113
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From: Brianna Pierce <bpierce@fnf.law>

Sent: Thursday, May 18, 2023 3:25 PM

To: Phil Yeager <phil@hansenlawfirm.net>; Constantine Economides <ceconomides@fnf.law>; Jingjing Ye <jye@yefirm.com>; 'Brian Barnhorst' <bbarnhorst@sacattorneys.com>; James Giacchetti <jgiacchetti@sacattorneys.com>; Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>; 'James Cai' <jcai@sacattorneys.com>; Woody Wu <wwu@sacattorneys.com>; selenachen1228@gmail.com; selena@findora.org

Cc: Craig Hansen <craig@hansenlawfirm.net>; Stephen C. Holmes <steve@hansenlawfirm.net>; Collin Greene <collin@hansenlawfirm.net>

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Phil,

We won't oppose a reasonable request for an extension, but we also won't stipulate given the Court's denial of our previous motion requesting to move the hearing date back one week. The motion for an extension and his order denying that request were served with the sanctions motion.

If you think it is necessary, we're happy to meet and confer; though this email is likely sufficient.

Brianna K. Pierce

Associate

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Admitted in California and New York Only

From: Phil Yeager <phil@hansenlawfirm.net>

Sent: Thursday, May 18, 2023 1:54:11 PM

To: Brianna Pierce <bpierce@fnf.law>; Constantine Economides <ceconomides@fnf.law>; Jingjing Ye <jye@yefirm.com>; 'Brian Barnhorst' <bbarnhorst@sacattorneys.com>; James Giacchetti <jgiacchetti@sacattorneys.com>; Patrick O'Shaughnessy <poshaughnessy@sacattorneys.com>; 'James Cai' <jcai@sacattorneys.com>; Woody Wu <wwu@sacattorneys.com>; selenachen1228@gmail.com <selenachen1228@gmail.com>; selena@findora.org <selena@findora.org>

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[EXTERNAL SENDER]

Counsel and Ms. Chen,

Due to the scope, length, and lack of notice of Abittan's motion for sanctions, we ask for a stipulation to extend time to respond by one week and to reschedule the May 31st hearing. Additionally, Craig Hansen is in trial in Santa Clara County Superior Court all next week.

We make this request pursuant to Local Rule 6.

Please let us know by COB today if you are amenable to such an extension, otherwise we will file a motion for an extension of time.

Thank you.

Phil

PHILIP EUGENE YEAGER (He, Him, His)



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